

City of Chicago Richard M. Daley, Mayor

Department of Environment

Henry L. Henderson Commissioner

Room 600A 320 North Clark Street Chicago, Illinois 60610 (312) 744-7606 (Voice) (312) 744-3586 (TT/TDD) (312) 744-6451 (FAX)



July 15, 1994

Mr. Paul R. Steadman, On-Scene Coordinator Emergency and Enforcement Response Branch Waste Management Division United States Environmental Protection Agency Region 5 77 West Jackson Boulevard Chicago, IL 60604-3590

RE: Request for Identification of ARARs for the former International Harvester Company Site Removal Action

Dear Mr. Steadman:

I am enclosing some additional information that may be relevant to the Navistar site. When we spoke, you were uncertain as to whether or not underground storage tanks were present at the facility. If such tanks are present, enclosed is some information pertaining to their abandonment or removal. Appropriate permits for these activities could be obtained from our office, if necessary.

If you have any further questions, please do not hesitate to call me at (312) 744-5959.

Sincerely,

Ann Capriotti

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Environmental Coordinator





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UST Fact Sheet

Under the Delegation Agreement between the State of Illinois, Office of the fire Marshall, (OSFM), and the City of Chicago, permits for Removal, Abandonment-in-Place, Installation, and Temporary Closure of Underground Storage Tank Systems will henceforth be obtained from the Department of Environment, 320 N. Clark St. Chicago, IL 60610.

- * Application is to be made in room 600-A, 320 N. Clark St.
- * The statewide fee for these permits will apply, (except temporary closures), at \$100 per site as specified in Illinois Administration Code, Title 41, Part 170.
- * Fee is to be paid by check or money order, payable to the City of Chicago, Department of Environment.
- * Fee is waived for application for temporary closure.
- * Registration of tanks, contractors, and testing will remain under the jurisdiction of the Office of the Fire Marshall (OSFM).
- * Application of the permit must be made at least 30 working days prior to performance of work.
- * Work performed without a permit will be subject to enforcement and prosecution by the City and/or State.
- * Notice of removal of tanks shall be given to the City of Chicago, Department of Environment and The Fire Prevention Bureau by telephone at least 72 hours prior to the date of removal.
- * Effective immediately no permits will be issued by this office for Underground Storage Tanks unless the tanks are registered and all 1988 annual fees (\$100 per tank and late registration fees (\$500 per tank) are paid.



CITY OF CHICAGO Department of Environment 320 N. Clark St. Room 600A Chicago, IL 60610

GUIDELINES FOR ABANDONMENT IN PLACE

This is provided for information only and should not be construed as a granted walver.

The following information is regarding a waiver from the current regulatory provision that requires that underground storage tanks be removed from the site if they are abandoned (41 Ill. Adm Code 170).

Waiver of the removal requirement for underground tanks shall be granted where it would be infeasible to remove the tank due to loss of adjacent or subjacent support of nearby structures, railroad trucks, street, product lines as defined in Section I-201 of the Illinois Vehicle Code (Ill. Rev. Stat. 1985, ch 95 1/2, par I201) or other tanks. The following criteria must be met:

- 1. A complete drawing, or plan of the area must be provided and show the location of tanks, fill pipes, vent lines, sewers, streets, product lines and buildings. Dimensions should be specified on plans. Site plans must be 8 1/2" X 11" or 11" X 17" in size only. Blue prints are not acceptable for site plans. Any associated piping to be abandoned in place must have prior approval by the City of Chicago, Department of Environment.
- 2. A certification is provided to this office that the subject tank systems are not leaking nor have leaked in the past. The owner/operator must measure for the presence of a release where contamination is most likely to be present at the UST site in accordance with 41 Ill. Adm Code 170.640 (a) and (b). Sample analysis must meet State established clean-up objectives.
- 3. The tanks shall be filled with sand or other inert material (approved by the Department of Environment, except that entirely filling a tank with ready mix concrete will not be allowed), and the procedure for filling shall be in accordance with API 1604 (1987) Sections 3.1-3.5, 4.1.1.
- 4. Where a tank is allowed to be abandoned in place due to loss of support of adjacent tanks, the tank shall be removed when the support is no longer needed.
- 5. When underground storage tanks are abandoned in place, the owner of the tank shall keep a permanent record of the tank location, the date of abandonment, and the method of conditioning the tank for abandonment and forward a copy of same to this office.
- 6. Persons seeking a waiver shall provide all documentation required in this subsection to the Department of Environment.

If you feel you meet the above requirements and would like to apply for a waiver, you should submit four copies of a completed permit application with the necessary documents including four copies each of a Statement of Need and site plans, along with a permit fee of \$100. Since the fee covers the cost of processing and review, no refunds will be issued if your request to abandon in place is denied. If you are required to remove the tank/s, another permit application to remove must be submitted to our office along with the additional permit fee.



CITY OF CHICAGO Department of Environment 320 N. Clark Street Room 600A Chicago, IL 60610

REQUIRED CHECKLIST FOR ABANDONMENT IN PLACE OF UNDERGROUND STORAGE TANKS

UST abandonments shall follow 41 Adm. Code Part 170 and any referenced material. The following checklist shall be followed as prescribed by the Office of the State Fire Marshall's regulations. These requirements do not exempt anyone from any other State or Federal requirements or regulations. Underground Storage Tank or "UST" includes underground pipes and cathodic protection connected thereto.

A. Secure proper permitting and required waivers for abandonment to the DOE.
B. An on site inspection shall be done to determine the accuracy of the Statement of New
and submitted site drawing. 170.670(c). If this on site inspection reveals that removal of as
tanks located inside a building will not cause structural damage, the abandonment permit will h
voided and removal of such tanks shall be mandatory.
C. All monitoring equipment shall be maintained according to manufacturing specifications
API 1604 4.3.1
D. Establish an exclusion zone (no smoking within). The use of spark producing/non-explosion
proof equipment is prohibited in the vapor hazard area. API 3.2.2 - 1.3.2
E. Excavate to the top of the tank, drain and remove all piping except the vent line. As
associated piping to be abandoned in place, must have prior approval, by the DOE. Pipe trenche
shall remain open for inspection by the DOE Tank Specialist. API 1604 3.2.5 - 3.2.6
F. Remove all liquids from the tank using explosion-proof pumps or hand pumps. API 1604 3.2.
G. The tank atmosphere and the excavation area shall be regularly monitored with a Combustible
Gas Indicator (CGI) for flammable or combustible vapor concentrations. Monitoring the UST shall
be done at 3 levels in the tank (bottom, Middle, and top). API 1604 3.2.7
H. Vapor freeing shall be done in accordance with API 1604 Section 4.2. When vapor freeing

- the tank with compressed air, all devices must be bonded to the tank and the tank must be grounded to a separate ground. API 1604 3.2.7

 I. Monitor tank to insure explosive conditions do not exist. Lower explosive limits (LEL)
- I. Monitor tank to insure explosive conditions do not exist. Lower explosive limits (LEL) 5% or less. API 1604 3.2.7

STOP!!!

DOE Tank Specialist must be on site before cutting and cleaning operations or tank abandonment can proceed. Ch 127 1/2 Par. 158

- J. A sufficient number of holes or openings shall be made in the tank for abandonment or tank entry, if existing tank openings are not adequate for entry to conduct proper cleaning and filling procedures. 170.670(a)(3) and API 3.2.8 7.2.1
- K. Proceed to introduce a suitable, solid, inert material through openings in the top of the tank to minimize any surface settling subsequent to disposal of the tank in place. 170.670(c)(4)
- L. After the tank is filled with inert material, all tank opening shall be plugged or capped, unless it was necessary to cut open the tank top. Disconnect and cap or remove the vent line. API 1604 3.2.10 3.2.11
- M. Tank owner must file the amended Notification of Underground Storage Tank form to OSFM within 30 days after abandonment, along with the completed Affidavit, from the contractor. 170.71(b)
- IF A RELEASE OF A REGULATED SUBSTANCE IS IDENTIFIED, the UST owner will have to report to the Illinois Emergency Management Agency (IEMA) within 24 hours (1-800-782-7860 or 217-782-7860 outside Illinois) and sample taking/closure reports will have to comply with IEPA requirements for corrective action.



CITY OF CHICAGO Department of Environment 320 N. Clark Street Room 600A Chicago, IL 60610

REQUIRED CHECKLIST FOR UNDERGROUND STORAGE TANK REMOVALS

UST removals shall follow 41 Ill. Adm Code Part 170 and any referenced material. The following checklist shall be followed as prescribed by the City of Chicago, Department of Environment's regulations. These requirements do not exempt anyone from any other State or Federal requirements or regulations. Underground Storage Tank or UST includes underground pipes and cathodic protection.

A. Secure permitting and required notices of removal to the DOE.

	All monitoring equipment shall be maintained according to manufacturing specifications. API 1604 4.3.1
	Establish an exclusion zone (no smoking within). The use of spark producing/non-explosion
	proof equipment is prohibited in the vapor hazard area.
	Excavate to the top of the tank, drain and remove all piping except the vent lines. Pipe
	trenches shall remain open for inspection by the DOE Tank Specialist. API 1604 4.1.5
	Remove all liquids from the tank using explosion-proof pumps or hand pumps. API 1604 4.1.3
	The tank atmosphere and the excavation area shall be regularly monitored with a Combustible
	Gas Indicator (CGI), for flammable or combustible vapor concentrations until tank is
	removed from both the excavation and the site. Monitoring the UST shall be done at 3
	levels in the tank (bottom, middle and top). API 1604 4.2
	Purging/vapor freeing shall be done in accordance with API 1604 Section 4.2. When purging
	the tank with compressed air or using inert gas under pressure, all devices must be bonded
	to the tank and the tank must be grounded to a separate ground. API 1604 4.2.
н.	Monitor tank to insure explosive conditions do not exist. Lower Explosive Limits (LEL)/5%
	or less or oxygen (02) 5% or less. API 1604 4.3.2 and 4.3.3
	Plug and cap all accessible tank holes. One plug should have a 1/8" vent hole. API 1604
	4.4.1
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	Excavate around tank to prepare for removal. 41 III Adm. Code Part 170.670(2)(c)
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DOE Tamproceed	STOP!!! Ak Specialist must be on site before cutting and cleaning operations or tank removal can 1. Ch. 127 1/2, Par. 158 Equipment with sufficient lifting capacity shall be used to lift the tank from the
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Department of Environment Engineering Unit Building Demolition/Renovation Information

TO BE FILLED IN BY APPLI		Date		
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Address-Owner:			· 	
Phone Owner:			-	
Address-Building:			WARD:	ZIP:
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Telephone Contractor:			_	
Building Size Length:	Width:	Height:		
Type of Building:		Method of De	emolition:	
Check Appropriate Box or Boxes) Fursuant to \$11-4 of the Municipmust therefore be disposed of or re Amount of Debris:	CHUTES: SUCKETS: pai Code, construction and den eprocessed at a property permit	OTHER nolition debris is ted facility.	: [] s statutorily de	fined as waste.
Date work to begin:	Estimated	date of Compl	etion:	
NOTE: Any change in demolition SIGNED DATE OF COMPLETION:	THE MUNICIPAL CODE OF commencement date must	CHICAGO. be reported to	Engineering U	
COMMENTS:				